

Remarks

Reconsideration of this Application is respectfully requested.

Claims 29-30 are sought to be added. Claims 18 and 28 are sought to be amended. Claim 27 is sought to be cancelled without prejudice of disclaimer. Applicants reserve the right to prosecute a similar or broader claim in a continuation application. Claims 18-26 and 28-30 are pending, with claim 18 being the sole independent claim.

Based on the above amendments and following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 103(a)

Claims 18, 19, and 21-28 were rejected under 35 U.S.C. § 103(a) ("103") as being unpatentable over WO Patent No. WO 98/28644 to Schultz ("Schultz") (using U.S. Patent No. 6,366,410 as a translated document) in view of U.S. Published Patent Application No. 2003/0053218 to Fujimoto ("Fujimoto"). Claim 20 was rejected under 103 as being unpatentable over Schultz in view of Fujimoto, further in view of U.S. Published Patent Application No. 2002/0036832 to Schultz ("Schultz PPA"). Applicant respectively traverses these rejections.

Claim 18 new recites:

A relay lens system positioned between a delimiter plane and a pattern generator plane of a lithography system, comprising:

 a first lens group consisting of three lenses that decrease numerical aperture of a received beam of radiation;

 a second lens group having at least one lens that receives the beam of radiation from the first lens group and controls characteristics of the beam of radiation at a pupil plane;

 a third lens group consisting of a single lens element that receives the beam of radiation from the second lens group and controls field characteristics of the beam of radiation at a patterning device plane;

 an aperture stop positioned between the first and second lens groups; and

 a fold mirror positioned between the second and third lens groups.

The Examiner admits both in the Final Rejection and the Advisory Action that Schultz lacks specific reference to the third lens group containing only one lens element, and relies on Fujimoto to allegedly teach the use of a third lens group containing a single lens element. However, Fujimoto clearly teaches in the abstract and paragraphs 0032, 0047, and 0091, as well as in Figures 1-4, that a third lens unit has two cemented lens elements not a single lens element. Fujimoto does not teach or suggest having a single lens element in the third lens unit. Applicants use a single lens element in a third lens group, for example, to reduce an amount of material, which reduces a cost of materials, needed to produce a desired optical effect (see, e.g., paragraphs 8 and 26 of the instant specification). Fujimoto's third lens unit has two lens elements and requires the same amount of optical material as two lenses to perform a desired optical function.

Also, neither Schultz or Fujimoto teach or suggest a first, second, and third lens group of a relay lens system performing the optical processes, e.g., decreasing numerical aperture of a received beam of radiation, controlling characteristics of the beam of radiation at a pupil plane, and controlling field characteristics of the beam of radiation at a patterning device plane, respectively, as now recited in claim 18.

Schultz II is not used to teach these features, and does not cure the deficiencies of Schultz in view of Fujimoto.

Therefore, none of the applied references taken either alone or in combination teach or suggest at least these features of claim 18. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejections. Also, at least based on their dependency, claims 19-26 and 28-30 should also be found allowable.

Conclusion

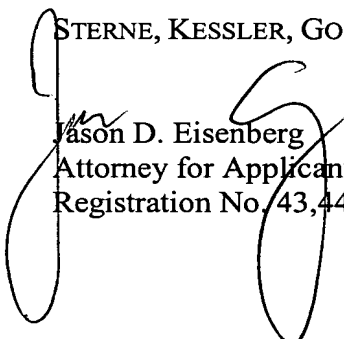
All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite

prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.


Jason D. Eisenberg
Attorney for Applicants
Registration No. 43,447

Date: 9/15/05

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600
417246.1